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possibly remote, interests are rights of entry after condition broken, covenants for renewal of leases, long term mortgages with rights of re-entry, and options to purchase. Of these only the latter are invalid, there being only one American case in point (§ 275 a; *Winsor v. Mills*, 157 Mass. 362). Limitations, like those in *Avern v. Lloyd* (L. R. 5 Eq. 383), and *In re Hargreaves* (43 Ch. D. 401), do not seem to have come before American courts. Professor Gray mentions as another alienable, but remote and therefore void interest, an executory devise to begin fifty years from testator's death (§ 201); yet a substantially identical interest may be created by reserving to the executors of the testator a term of fifty years. As we are constantly told that the rule against perpetuities is a practical rule, the value of a test which fails in most cases may be well doubted. Those states which have adopted as a test the suspension of the power of alienation have a rule of much greater simplicity, a rule which, moreover, also fits the case of interests vested without right of possession, which Professor Gray thinks must be met by the invention of a new rule (§ 121 i).

The most notable other additions which the new edition presents, are sections dealing with the period for the exercise of a power of sale by executors (§ 214 a-c), with the question whether a trust to pay income for an excessive number of years is good for twenty-one years (§ 410 a-d), with powers of sale given to trustees (§ 509 a-r), and with certain aspects of gifts to charities (§ 603 a-i), an appendix on gifts to indefinite persons for non-charitable purposes, and another appendix on the relation of conversion to the rule against perpetuities.

A large number of cases decided since the first edition are commented on.

It is superfluous to speak of the well-known merits of Professor Gray's work, of the profound learning of which it bears evidence, of the care and the excellent judgment with which all phases of a complex and difficult subject are discussed, of the lucidity and charm of its style. Of all American legal treatises Gray's *Rule against Perpetuities* probably comes nearest to being a "book of authority." The second edition will confirm its standing and increase its influence.

E. F.

A TREATISE ON THE LAW OF REAL PROPERTY. By Frank Goodwin. Boston: Little, Brown, and Company. 1905. pp. lii, 531. 8vo.

"This book is intended to be useful to students of law who are undertaking the study of real property." It is well adapted to carry out its intention. A student of law at a school using the case system will always find it greatly to his advantage after the completion of a subject in a course to read a standard work on that subject; and he could scarcely find a treatise on the law of real property better suited to his purpose than this treatise by Professor Goodwin. In it he will find a fairly comprehensive treatment of the main principles, developed in a scholarly and logical manner, and set forth in an excellent style, clear, concise, and readable.

The author expresses the hope "that the book will be found useful to the practitioner." Among other things, the practitioner requires an exhaustive citation of authorities; he wants a discussion of the latest cases; and he expects a statement of the arguments pro and con on mooted questions, with the author's solution of the problem. All this he desires, and in addition thereto he demands that every practical device be used to make the contents of the book available for ready reference. In short, the practitioner wants an encyclopaedic reference book. Professor Goodwin's treatise does not pretend to be that. Notwithstanding, it may be of considerable help to a Massachusetts lawyer. Massachusetts decisions are cited in great number to the practical exclusion of decisions in other jurisdictions. The latest Massachusetts cases of importance are noticed and discussed. Differences between Massachusetts rules and rules elsewhere are noted. Massachusetts statutes changing the common law are referred to. It is a treatise on the common law of real property from the Massachusetts standpoint.

Beyond this the book has no peculiar or noteworthy features. As might be expected, it contains little that is new, much that is old. Within the bounds of five hundred pages covering the nature of interests in real property, the creation and transfer thereof, and the rights and obligations appertaining thereto, one does not expect to find a statement of all the ramifications of a general principle and its multifarious applications to the complex conditions of a growing civilization. Within those pages Professor Goodwin has covered an old and familiar field in a worthy manner.

C. M. O.

BRIEF MAKING AND THE USE OF LAW BOOKS. By William M. Lile, Henry S. Redfield, Eugene Wambaugh, Alfred E. Mason, and James E. Wheeler. Edited by Nathan Abbott. St. Paul, Minn.: West Publishing Co. 1905. pp. viii, 472. 8vo.

The author of the introduction to this volume, William M. Lile, states an obvious truth: namely, that the graduates of our law schools do not know how to draw good briefs. Hence this volume of nearly five hundred pages. It is composed of four parts: I. The Brief on Appeal, by Henry S. Redfield, pp. 1-65; II. How to Use Decisions and Statutes, by Eugene S. Wambaugh, pp. 66-118; III. American Law Publications, by Alfred M. Mason (a classified guide to the authorities: statutes decisions, treatises, and digests), pp. 119-172; IV. How to find the Law, by James E. Wheeler (an alphabetical classification of the various topics of the law, with a brief description of the range and contents of each, concluding with a hundred odd pages of abbreviations of law publications), pp. 173-459.

If the advice and information contained in these pages cannot teach our law school graduates how to draw good briefs, "nothing can make 'em — the devil take 'em" — except possibly experience. If the instruction provided in the schools has not served to impress the students with the difference between a *dictum* and a decision, between statute law and judge-made law, between lower courts and higher, Professor Wambaugh's admirable treatment of these and similar matters offers them a last clear chance to learn; if they have not learned how to use the law school libraries, nor familiarized themselves with the abbreviations of the reports, here are over three hundred pages of eleventh-hour directions. In short, if muddy thinking may be clarified by precept, and unmethodical habits of work be corrected by putting his tool chest in order for the apprentice, no young attorney can read this book without profit. Pedagogics is nothing if not an optimistical science; if we could share the optimism of the cult, it would not be extravagant to predict that with the appearance of this work the days of bad brief drawing were over.

A SUMMARY OF TORTS. By Frank A. Erwin. Second Edition, revised and enlarged. New York City: Leslie J. Tompkins. 1906. pp. viii, 225. 8vo.

A TREATISE ON THE LAW OF MUNICIPAL CORPORATIONS. By Howard S. Abbott. In three volumes. Volumes I and II. St. Paul, Minn.: Keefe-Davidson Company. 1905, 1906. pp. xix, 1-965; xvi, 967-1979. 8vo.

CURRENT LAW. A Complete Encyclopedia of New Law. Volume IV., Indictment to Witnesses. George Foster Longsdorf, Editor. Walter H. Shumaker, Associate. St. Paul, Minn.: Keefe-Davidson Company. 1905. pp. xv, 1971. 4to.

LIMITATIONS OF THE TAXING POWER, including Limitations upon Public Indebtedness. A Treatise upon the Constitutional Law governing Taxation and the Incurrence of Public Debt in the United States, and in the Territories. By James M. Gray. San Francisco: Bancroft-Whitney Company. 1906. pp. lx, 1316. 8vo.